

## PIERRE PIERRE LAW, P.C.

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August 2, 2022

### MEMORANDUM ENDORSED

Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Letter Motion:  
Extension of Time Request**

**Re: Sonia Turner v. Comm'r of SSA 1:22-cv-01579-GWG**

Dear Honorable Judge Gorenstein:

Pursuant to the Scheduling Order in the above referenced case, Plaintiff's Motion for Judgment on the Pleadings is due on August 5, 2022.

Plaintiff writes to respectfully request a first extension of time of sixty (60) days to file and serve her motion. Counsel will be out of the country for the next several weeks and planned on completing Plaintiff's motion prior to that time. However, due to multiple motions coming due at the same time and staffing issues, we will be unable to complete our motion prior to the due date. Accordingly, Plaintiff writes to respectfully request an extension of time of sixty days (60), with the following proposed revised Scheduling Order:

- a) Plaintiff to serve her motion on or before October 4, 2022;
- b) Defendant to serve her cross motion on or before December 3, 2022;
- c) Plaintiff to serve her Reply, if any, on or before December 24, 2022;
- d) Defendant shall file any reply to Plaintiff's motion by January 7, 2023.

Defendant has given consent to this request. Thank you in advance for the Court's consideration of this request.

Respectfully Submitted,

/s/Eddy Pierre Pierre

Eddy Pierre Pierre, Esq.

Attorney for Plaintiff


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Cc: Joseph A. Pantoja, Esq. (Via ECF)  
Attorney for Defendant.

The proposed schedule is approved.

So Ordered.

  
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GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
August 3, 2022